

Lincoln Law, LLP
Carl R. Gustafson, Bar No. 254881
Tessa Meyer Santiago, UT Bar 09324
Attorney for Debtor
1525 Contra Costa Blvd.
Pleasant Hill, CA 94523
Telephone: (800) 722-6578
Facsimile: (800) 584-6826

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA**

In re:)	Case No.: 10-71788
JESUS EDGAR MONTANO,)	Chapter 7
Debtor.)	Adversary Case No. 11-4008
<hr/>		
HERITAGE PACIFIC FINANCIAL, LLC.,)	DECLARATION OF TESSA MEYER
d/b/a HERITAGE PACIFIC FINANCIAL,)	SANTIAGO IN SUPPORT OF
a Texas Limited Liability Company,)	DEFENDANT'S RULE 26(b) MOTION
Plaintiff,)	FOR ADDITIONAL
)	INTERROGATORIES
v.)	
JESUS EDGAR MONTANO,)	Hearing Date: March 13, 2013
Defendant.)	Time: 10.30 AM
)	Courtroom: 220
)	Place: 1300 Clay Street
)	Oakland, CA 94612
)	Before Honorable Judge William J Lafferty

I, Tessa Meyer Santiago, do hereby declare the following:

- I am the attorney for Defendant Jesus Montano, and have personal knowledge of the foregoing facts. I am willing and capable to testify if necessary.

1 2. The document attached as Exhibit A is a true and correct copy of the letter dated
2 July 5, 2011 which I drafted and which was signed by Carl Gustafson, and sent to
3 Jennifer Hupe, counsel for Plaintiff Heritage Pacific Financial.
4

5 3. The document attached as Exhibit B is a true and correct copy of Plaintiff
6 Heritage Pacific Financial's response to Defendant's First Set of Interrogatory Requests.
7

8 4. The document attached as Exhibit C is a true and correct copy of the proposed
9 Rule 69 Interrogatories which Defendant Montano seeks leave to serve on judgment-
10 debtor Heritage Pacific Financial.
11

12 5. The document attached as Exhibit D is a true and correct copy of the Proposed
13 Statement of Decision Following Court Trial, entered in the *Abdelkfattah v. Heritage*
14 *Pacific Financial*, Case No. 1-10-CV-171231 (Santa Clara, October 18, 2012).
15

16 6. The document attached as Exhibit E is a true and correct copy of the Transcript of
17 the Deposition of Benjamin Ganter, taken in the case *See Heritage Pacific v. Rosita*
18 *Gonzalez; Francisco Morales Gonzalez, et al. v. Heritage Pacific Financial, LLC*, Case.
19 No. 1-10-CV-173203 (Cal. Sup. Ct. Santa Clara).
20

21 I DECLARE UNDER PENALTY OF PERJURY IN THE STATE OF UTAH THAT THE
22 FOREGOING IS TRUE AND CORRECT.
23

24 DATED: 12 February, 2013, Orem Utah

/s/Tessa Meyer Santiago

25 Tessa Meyer Santiago
26 LINCOLN LAW, LLP
27 Attorney for Defendant
28